

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF REGIONAL OFFICES SUFFOLK REGIONAL OFFICE

July 6, 2021

Hon. A. Kathleen Tomlinson United States District Court Eastern District of New York 100 Federal Plaza P.O. Box 9014 Central Islip, New York 11722

Re:

New York State Telecommunications Ass'n, Inc., et al. v. James

Docket No.: 21-CV-02389 (DRH) (AKT)

Dear Magistrate Judge Tomlinson,

The undersigned represents Defendant Letitia James, the Attorney General of the State of New York, in the above-captioned action. I write, with the consent of Plaintiffs, to submit a joint request that the Court adjourn the time within which Defendant is required to file an Answer and adjourn the Initial Conference as well as the deadlines triggered by the scheduling of the Initial Conference.

Defendant's answer is currently due on July 12, 2021, and the Initial Conference is currently scheduled for July 28, 2021, with the "meet and confer," Initial Disclosures, and Joint Proposed Discovery Plan due in accordance with this Court's Initial Conference and Case Management Order, dated June 15, 2021. No previous request for adjournment of these dates has been made. This request is being made because the parties are working towards an expedited resolution of the matter at the trial court level. The parties propose a 30-day adjournment of all deadlines, with the Answer due on August 11, 2021 and the Initial Conference scheduled for August 27, 2021.

Thank you for your consideration of this application.

Respectfully,

Patricia M. Hingerton

Assistant Attorney General

## cc: BY ECF:

Scott H. Angstreich, Esq.
Joseph S. Hall Esq.
Andrew E. Goldsmith Esq.
KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.
1615 M Street, N.W., Suite 400
Washington, D.C. 20036

Jeffrey A. Lamken Esq. Rayiner I. Hashem Esq. MOLOLAMKEN LLP 600 New Hampshire Ave., N.W., Suite 500 Washington, D.C. 20037

Jared Marx Esq.
Michael Nilsson Esq.
HARRIS, WILTSHIRE & GRANNIS LLP
1919 M Street, N.W.
The Eighth Floor
Washington, D.C. 20036